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January 5, 2021

## VIA ECF

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Gergely Csikos v. S.M. Construction & Contracting, Incorporated, et al.  
Docket No.: 18-cv-09598-VEC

Your Honor:

As you are aware, we represent Plaintiff, Gergely Csikos, in the above referenced matter. Please accept this correspondence as a joint status report, as well as to request to extend the time to submit a joint pretrial letter and adjourn the pretrial conference presently scheduled for January 8, 2021.

By letter dated December 14, 2020, Defendant 230 Park South Apartments, Inc. sought leave from the Court to serve a further, second third-party complaint against Mr. Reisner, individually, as well as against two of Mr. Reisner's business entities, IR Holdings, LLC and Parkview Developers, LLC.

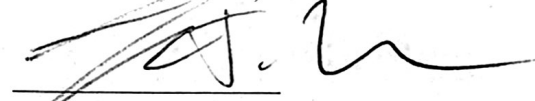
On December 21, 2020, Your Honor issued an Order granting Defendant 230 Park South's request and Defendant 230 Park South has until January 8, 2021 to file said third-party complaint.

As Mr. Reisner was represented at his deposition by counsel for third-party defendant Remodel Art Corp. and, counsel has fully participated in the defense of this litigation, it is not anticipated that any substantial, future discovery will be required by Mr. Reisner or his two business entities IR Holdings, LLC and Parkview Developers, LLC. Plaintiff and Defendant 230 Park South anticipate serving discovery requests for records and documents arising from Mr. Reisner's testimony and possibly serving supplemental discovery requests for records and documents in the possession of the two business entities IR Holdings, LLC and Parkview Developers, LLC. Additionally, it does not appear as though any further depositions will be warranted as to the parties.

In light of the foregoing, the parties are jointly requesting an extension of time to submit a joint pretrial letter until March 5, 2021. Further the parties are requesting an adjournment of the pretrial conference from January 8, 2021, until March 12, 2021 in order for the parties to obtain records and documents arising from Mr. Reisner's testimony and possible supplemental discovery requests from these new parties.

Thank you for your attention to this matter.

RESPECTFULLY YOURS,  
RONAI & RONAI, LLP



By: Timothy J. Lavin (TL6371)

Cc: All Parties via ECF

Application GRANTED. The pretrial conference scheduled for January 8, 2021 is adjourned to **March 12, 2021 at 10:00 a.m.** The parties' joint letter is due by **March 4, 2021**. All discovery must be complete by **March 12, 2021**.

Separately, the Clerk of Court is directed to close the open motion at docket entry 105. The issue was resolved at a prior pretrial conference with the parties.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

1/5/2021